

SCM

LAW OFFICES

## DRINKER BIDDLE &amp; REATH

PHILADELPHIA NATIONAL BANK BUILDING  
1345 CHESTNUT STREET  
PHILADELPHIA, PA 19107-3496

TELEPHONE: (215) 988-2700

TELEX: 834684

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SUITE 900  
901 FIFTEENTH STREET, N.W.  
WASHINGTON, DC 20005-2503  
(202) 842-8800

WILLIAM V. ROEDER  
(215) 988-2637

SUITE 400  
47 HULFISH STREET  
POST OFFICE BOX 827  
PRINCETON, NJ 08542-0827  
(609) 921-6338

SUITE 300  
1000 WESTLAKES DRIVE  
BERWYN, PA 19312-2409  
(610) 893-2200

CONFIDENTIAL FOR  
SETTLEMENT PURPOSES ONLY

September 12, 1996

BY FACSIMILE

Damaris Cristiano, Esquire  
Assistant Regional Counsel  
U.S. Environmental Protection Agency  
Region II  
290 Broadway  
New York, New York 10007

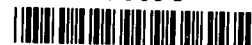
Re: *De Minimis* Settlement  
216 Paterson Plan Rd., Carlstadt, NJ ("SCP")

Dear Ms. Cristiano:

As you are aware, we represent the interests of SCM Corporation at the above-referenced site and wish to participate in the *de minimis* settlement.

During our last conversation, you requested a brief synopsis of SCM's corporate history. The SCM facility alleged to have sent waste to this Site is Allied Coated Products Division, a Division of SCM. This division was also known variously as SCM Specialty Coating Group and as Allied Coated Products, Allied Paper Division of SCM. On or about March 31, 1986, SCM, including Allied, was acquired by HM Holdings, Inc., a Delaware Corporation.

As I indicated in my previous letters requesting *de minimis* consideration, there is no evidence to suggest that SCM's waste was ultimately disposed of at the Site. We do not have any



DRINKER BIDDLE &amp; REATH

Damaris Cristiano, Esquire  
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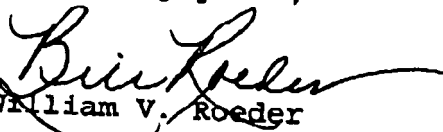
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copies of manifests, lading documents, or the like. For purposes of settlement, SCM has acknowledged that approximately 4,100 gallons of SCM's sludge may have gone to the Site. This is the number that has been allocated to SCM by the PRP group at this Site and for obvious reasons, the information about that process is confidential. You also questioned the nature of SCM's waste stream. I have enclosed a copy of our blanket purchase order with Jonas Inc., As you can see, the purchase order indicates that Jonas would remove sludge, zinc oxide/solvent drums from SCM's Allied facility.

Nothing in this letter should be construed as an admission on any issue of law, fact or liability in connection with this Site. All such liability being expressly denied. The provision of the waste-in amount is being provided to EPA for purposes of settlement only.

I hope you find this information helpful. Please do not hesitate to contact me if you need additional information.

Very truly yours,

  
William V. Roeder

WVR/  
Enclosure

**SCM SPECIALTY COATING GROUP**  
 ALLIED PAPER DIVISION OF SCM CORPORATION  
 POST OFFICE BOX 350  
 PHOENIXVILLE, PA. 19460  
 PHONE (215) 933-1161

**PURCHASE ORD  
 NO. P- 1733**

ORDER DATE <b>12/7/77</b>	REQUIRED DELIVERY <b>As Needed</b>	REQUISITION NUMBER	<b>42</b>
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**T  
O**  
**Jonas, Inc.**  
**Berkridge Road**  
**Bewell, N.J. 08080**

**SHIP PREPAID TO:**  
**SCM Specialty Coating Group**  
 ALLIED PAPER DIVISION OF SCM CORPORATION  
 RT. 23 AT FRENCH CREEK  
 PHOENIXVILLE, PA. 19460  
 PHONE (215) 933-1161

**BILL TO:**  
**SCM Specialty Coating Group**  
 ALLIED PAPER DIVISION OF SCM CORPORATION  
 POST OFFICE BOX 350  
 PHOENIXVILLE, PA. 19460  
 PHONE (215) 933-1161

(SCM INTERNAL USE ONLY - VENDOR DISREGARD)

DELIVER TO  
 DEPARTMENT **APC**  
 ACCOUNT CODE  
**5100-537-4**

ROUTING

F.O.B.

TERMS

EXEMPT CERTIFICATE  
 99-08418

**Your Pick-Up**

**Delivered**

**Net 30**

EXEMPT ☒ TAXABLE

ITEM	QUANTITY	UNIT	SCM PART NUMBER	DESCRIPTION	UNIT PRICE	AMOUNT
				<p><b>Removal of sludge, zinc oxide/solvent drums from SCM Allied Paper.</b></p> <p><b>Please supply the following:</b></p> <ol style="list-style-type: none"> <li>1. Current permit or permits issued by environmental regulatory agencies to your firm covering the treatment reclamation and/or disposal of waste.</li> <li>2. Certification from you stating that "disposal of the above materials will be carried out in accordance with all applicable Federal, State and Local regulations.</li> </ol>	<p><b>12.00 PER DRUM</b>  <del>10.00/ea</del>  <b>9.00/ea</b>  <b>107</b>  <b>J.H.</b></p>	<p><b>108.00</b></p>

PLEASE MARK ALL PACKAGES WITH SCM PART NUMBER:

**J.E. Hartman**